

# KEEFE BARTELS

TRIAL ATTORNEYS

Reply to:  
Monmouth County Office  
170 Monmouth Street  
Red Bank, NJ 07701  
Tel: 732-224-9400  
Toll Free: 877-288-9247  
Fax: 732-224-9494

April 16, 2013

John E. Keefe, Jr.<sup>1,3</sup>  
Patrick J. Bartels<sup>4</sup>  
Stephen G. Grygiel<sup>7</sup>

Via ECF

Hon. Madeline Cox Arleo, U.S.M.J.  
United States District Court  
Martin Luther King Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

John E. Gregory, Jr.<sup>5</sup>  
Jennifer L. Harwood<sup>5</sup>  
Joshua S. Kincannon<sup>6</sup>  
Robert A. Storino<sup>5</sup>  
Stephen T. Sullivan, Jr.<sup>4</sup>

Re: Chaudhri v. Osram Sylvania, Inc., et al.  
Civil Action No. 11-5504 (SDW) (MCA)

Of Counsel  
John E. Keefe, Sr.  
C. Judson Hamlin

Dear Judge Arleo:

Frank R. DiMarzio  
Craig H. Livingston<sup>2</sup>  
Ronald H. Siegel

My law firm and I are co-counsel to the plaintiff in the above-mentioned matter. This matter is currently scheduled for a Discovery Conference on April 18, 2013 at 10:30 a.m. The Conference was previously scheduled for March 27, 2013 but adjourned by the Court.

Certified Civil Trial Attorney<sup>1</sup>  
Certified Workers'  
Compensation Attorney<sup>2</sup>

I am scheduled to appear and speak at the New Jersey Association for Justice Conference in Atlantic City, New Jersey at the same time and date as the Discovery Conference. My appearance was scheduled and confirmed prior to the Discovery Conference's rescheduling. Accordingly, I respectfully request that the Conference be adjourned. We have requested consent from defense counsel for the adjournment but, at the time of this letter, have not received a response.

Admitted:  
N.J., D.C., N.D.Fla.<sup>3</sup>  
N.J., Pa.<sup>4</sup>  
N.J., N.Y.<sup>5</sup>  
N.J., Pa., N.D.Fla.<sup>6</sup>  
N.Y., De., Me., Ma.<sup>7</sup>

Thank you for the Court's kind consideration of and attention to this request.

Essex County Office  
56 Ferry Street  
Newark, NJ 07105  
Tel: 973-274-0408  
Toll Free: 877-288-9247  
Fax: 973-274-0409

Respectfully submitted,

/s/ John E. Keefe, Jr.  
JOHN E. KEEFE, JR.  
For the Firm

Middlesex County Office  
57 Paterson Street  
New Brunswick, NJ 08901  
Tel: 732-253-7870  
Toll Free: 877-288-9247  
Fax: 732-253-7872

cc: Counsel of Record (via ECF)